

# SHAW KELLER

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LLP

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September 13, 2021

**BY CM/ECF**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
844 N. King Street  
Wilmington, DE 19801

Re: *Finjan LLC v. Trustwave Holdings, Inc.*, C.A. No. 20-371-LPS

Dear Judge Stark:

Pursuant to the Court's procedures regarding Discovery Matters, Finjan LLC ("Finjan") and Trustwave Holdings, Inc. ("Trustwave") write to request the scheduling of a discovery teleconference in the above-referenced matter.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a meet-and-confer by telephone on September 3, 2021:

Counsel for Finjan

Delaware Counsel: Jeff Castellano, Shaw Keller  
Lead Counsel: Bijal Vakil, Allen & Overy

Counsel for Trustwave

Delaware Counsel: Jack Blumenfeld, Morris Nichols  
Lead Counsel: Jared Brandyberry, BakerHostetler

The parties also met and conferred on August 12, 2021. The parties were unable to resolve certain matters during the telephonic meet-and-confer. The disputes requiring judicial attention are listed below:

1. Finjan's disclosures pursuant to Paragraph 7(a) of the Scheduling Order as to the basis for Finjan's inclusion of certain Trustwave products as accused products.
2. Trustwave's responses to Finjan's First Set of Interrogatories, Nos. 1-4, 6.
3. Trustwave's production of documents responsive to Finjan's First Set of Requests for Production of Documents, Nos. 1, 3, 5, 11, 13, 15, 17, 18, 19, 20, 25, 26.
4. Trustwave's disclosures pursuant to Paragraph 7(b) of the Scheduling Order as to 11 of the 15 accused products and sales information.

We respectfully request that the Court set a discovery teleconference for resolution of these issues.

SHAW KELLER LLP

The Honorable Leonard P. Stark

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Respectfully,

*/s/ Jeff Castellano*

Jeff Castellano (No. 4837)

cc: Clerk of the Court (by CM/ECF)  
All counsel of record (by CM/ECF and email)